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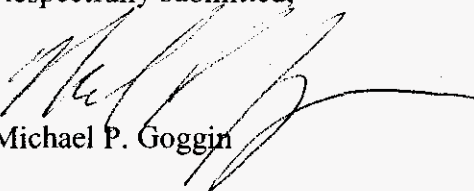
Cingular Wireless • 1818 'N' Street N.W. • Suite 800 • Washington, DC 20036-2478 • www.cingular.com

4. The wireless industry is highly competitive.²
5. The release of such information will cause substantial competitive harm to Cingular. Disclosure of Cingular's five-year plans for its expenditures of universal service funds would give Cingular's competitors access to privileged information that would affect the actions of those competitors. Competitors seeking to compete with Cingular could upgrade their networks in an attempt to, for example, preempt Cingular's planned upgrades. Also, by providing information about where Cingular intends to expand coverage, Cingular could expose itself to predatory practices by tower owners and potential tower site owners in areas where it has committed to add cell sites.
6. Cingular considers the information in Exhibit F to be proprietary and confidential and does not distribute such information to any party outside of the company, with the exception of outside counsel.
7. The information in Exhibit F is not available to the public and has not been disclosed to any other third party, with the exception of outside counsel.
8. The information provided in Exhibit F should never be released for public inspection, as this document contains proprietary company information that is competitively and financially sensitive. Even after the five-year term of the plan expires, Cingular would not reveal to its competitors the amount of money it has spent in the past in certain wire centers. At a minimum, the information should be kept confidential for a period of ten years.

For the foregoing reasons, Cingular respectfully requests that the Commission provide for confidential treatment of Exhibit F.

If you have any questions regarding this supplemental information or the confidentiality request, please contact the undersigned.

Respectfully submitted,



Michael P. Goggin

cc: Mark Seifert
Alex Minard

² See, e.g., *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, Eighth Report*, 18 F.C.C.R. 14783, 14812 (2003) ("Continued downward price trends, the continued expansion of mobile networks into new and existing markets, high rates of investment, and churn rates of about 30%, when considered together with the other metrics, demonstrate a high level of competition for mobile telephone consumers."); *Ninth Report*, 19 F.C.C.R. 20597, 20600-01 (2004) ("[C]ompetition is robust in terms of the current number of competitors per market ..." and "[i]ndicators of market performances show that competition continues to afford many significant benefits to consumers.").

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Federal-State Joint Board)	CC Docket No. 96-45
on Universal Service)	
)	
Petition of AT&T Wireless Services, Inc.)	
for Designation as an Eligible Telecommunications)	
Carrier Pursuant to Section 214(e)(6) of the)	
Communications Act)	

To: The Commission

**AMENDMENT TO THE PETITION OF AT&T WIRELESS SERVICES, INC.
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF ALABAMA**

Cingular Wireless LLC ("Cingular"), on behalf of itself and its affiliated licensee entities in Alabama, respectfully submits an amendment to the petition of AT&T Wireless Services, Inc. ("AWS") for Designation as an Eligible Telecommunications Carrier in the State of Alabama, filed on December 29, 2003 ("Petition") and Supplement to the Petition, filed on May 11, 2004 ("Supplement") (collectively, "AWS Petition").¹ Since the filing of the AWS Petition, AWS was merged into a subsidiary of Cingular's parent and manager, Cingular Wireless Corporation ("CWC"). As part of the merger, the Commission approved a transfer of control of the licenses held by AWS and its subsidiaries to CWC and its subsidiaries.² As such, the licenses at issue in

¹ See *Parties Are Invited to Update the Record Pertaining to Pending Petitions for Eligible Telecommunications Carrier Designations*, Public Notice, 19 FCC Rcd 6409 (2004).

² *Application of AT&T Wireless Services, Inc. and Cingular Wireless Corp. for Consent to Transfer Control of Licenses and Authorizations*, WT Docket No. 04-70, *Memorandum Opinion and Order*, 19 FCC Rcd 21522 (2004) ("Cingular Merger Order"). Immediately thereafter, the parties consummated the merger. CWC and AWS also entered into a consent decree on October 25, 2004 with the Antitrust Division of the U.S. Department of Justice ("DOJ") approving the merger. *United States v. Cingular Wireless Corp., SBC Communications Inc., BellSouth Corp., and AT&T Wireless Services, Inc.* 69 Fed. Reg. 65633 (rel. Nov. 15, 2004). See also AWS Supplement to Petition at 2, n.3 (noting the pending merger application).

this ETC petition are now either wholly owned or controlled by Cingular. Cingular files this amendment to update the legal names of the applicant entities in the AWS Petition and to amend the AWS Petition to further refine the non-rural wire centers where it seeks designation by adding additional wire centers served by the merged entity and removing others. This amendment also withdraws all rural telephone company study areas in which designation was requested in the AWS Petition. The revised list of wire centers in which designation is requested is set forth in Exhibit B attached hereto.

AWS requested ETC designation on behalf of itself and the following subsidiary licensees: AirCom PCS, Inc., Tritel C/F Holding Corp., Tritel A/B Holding Corp., AT&T Wireless PCS, LLC and QuinCom, Inc. The licenses held by these subsidiaries have been transferred to variously to the following Cingular entities: New Cingular Wireless PCS, LLC; Blue Licenses Holding, LLC and Orange Licenses Holding, LLC. A list of the licenses and holding entities is attached as Exhibit D.

In this amendment, Cingular provides certification that it meets all the statutory and regulatory prerequisites for designation as a federal ETC, including those delineated in the Commission's recent *ETC Report and Order*.³ This amendment provides certain additional information as required by the *ETC Report and Order* along with other updates to the information in the AWS Petition.

I. BACKGROUND

Cingular is a Delaware limited liability company whose principal place of business is located in Atlanta, Georgia. All correspondence regarding this proceeding should be directed to the undersigned counsel for Cingular:

³ *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371 (2005) ("*ETC Report and Order*"). See also Exhibits A and C hereto.

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Suite 700
Washington, DC 20037
(202) 383-3414

Cingular is authorized by the Commission to provide commercial mobile radio services (“CMRS”) throughout the license service areas within the State of Alabama noted in Attachment D.

As did AWS, Cingular provides all of the services and functionalities supported by the federal universal service programs enumerated in 47 C.F.R. § 54.101(a)(1)-(9) throughout its license service areas in Alabama. Cingular also certifies that it will offer a variety of high quality universal service offerings in its designated areas utilizing its wireless network infrastructure. Cingular will offer service to any requesting customer within its designated service area upon reasonable request.

Cingular will use high-cost support for the provision, maintenance, and upgrading of the facilities and the service for which universal service is intended. Cingular will use low-income universal service support of the provision of Lifeline and Link-Up discounted service to qualifying low-income consumers. Cingular will also comply with all of the additional annual reporting requirements in the Federal Communication Commission’s (“FCC” or “Commission”) *ETC Report and Order*.

II. CINGULAR SATISFIES THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS A FEDERAL ETC

Cingular satisfies each of the statutory and regulatory prerequisites set forth in the Act, the Commission's Rules and Orders,⁴ and the *Public Notice*⁵ to be designated a federal ETC in the state of Alabama.

A. Cingular is a Common Carrier

Cingular certifies that it is a "common carrier" under 47 U.S.C. § 214(e)(1) and 214(e)(6) for purposes of ETC designation.

B. Cingular Offers the Services and Functionalities Supported by the Federal High-Cost and Low-Income Universal Service Program

AWS listed in its Petition the services and functionalities that the Commission considers to be the core services to be offered by an ETC and supported by the federal universal service support mechanism, including: (1) voice-grade access to the public switched telephone network; (2) local usage; (3) dual-tone multi-frequency signaling or its functional equivalent; (4) single-party service or its functional equivalent; (5) access to emergency services; (6) access to operator services; (7) access to interexchange service; (8) access to directory assistance; and (9) toll limitation for qualifying low-income consumers.⁶ A certification is required that the carrier provides the supported services. Cingular confirms in the attached Declaration of Cingular

⁴ *Federal-State Joint Board on Universal Service; Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, *Memorandum Opinion and Order*, 19 FCC Rcd 1563 (2004) ("Virginia Cellular"); *Federal State Joint Board on Universal Service; Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, *Memorandum Opinion and Order*, 19 FCC Rcd 6422 (2004) ("Highland Cellular"); *ETC Report and Order*.

⁵ *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, CC Docket No. 96-45, *Public Notice*, 12 FCC Rcd 22947 (1997).

⁶ 47 C.F.R. § 54.101(a)(1)-(9).

Wireless LLC (attached as Exhibit A) that it currently provides all of the supported services specified in 47 C.F.R. § 54.101(a)(1)-(9) throughout its requested service areas.

Since AWS' Petition, the FCC rules have been amended with respect to offering "local usage". Specifically, the current FCC rules require an ETC applicant to "demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation."⁷ While the FCC has declined to adopt a specific local usage threshold, it instead requires that the local usage plan of an ETC applicant be reviewed on a case-by-case basis.

Cingular is committed to providing all its 54.1 million customers with valuable calling plans and believes that its calling plans are comparable in value to the one offered by the incumbent LEC. Calling plans cannot be compared solely on price, but must also consider calling scope and the additional features and functionalities offered. Cingular's current calling plans offer consumers numerous benefits including the inherent mobile nature of wireless service. Further, Cingular's "local" calling area is much broader than the incumbent LEC. For example, customers that currently choose the Cingular Nation GSM or the FamilyTalk calling plans never pay additional roaming or long distance charges in the United States and are served by the largest voice and data network in America. Thus, all calls from anywhere on the Cingular network to anywhere else in the United States are "local" calls for these customers. Also, the calling plans currently offered by Cingular include numerous features that are available at no additional charge, such as: Voicemail, Caller ID, Call Forwarding, Call Waiting, Detailed Billing, and Three-Way Calling. Moreover, many calling plans include either unlimited nights and weekend minutes or generous night and weekend minute packages. All calling plans

⁷ 47 C.F.R. § 54.202(a)(4).

currently offered include unlimited mobile calling between Cingular customers, and allow customers to Rollover unused minutes for use in subsequent months. Examples of Cingular's calling plans are attached as Exhibit E.

C. Cingular Will Provide the Supported Services Using its Own Facilities or a Combination of Its Own Facilities and Resale of Another Carrier's Services

Cingular certifies that it will provide the supported services using its own facilities or a combination of its own facilities and the resale of another carrier's service. Cingular primarily will use its own network infrastructure, which includes the same antennae, cell-sites, towers, trunking, mobile switching and interconnection facilities used to serve its existing customers,

D. Cingular Will Advertise the Availability of and Charges for its Universal Service Qualifying Offerings

Cingular certifies that it will advertise the availability of the supported services and the corresponding rates and charges in a manner designed to inform the general public within its designated ETC service areas. This advertising will occur through some combination of media channels, such as television and radio, newspaper, magazine and other print advertisements, outdoor advertising, direct marketing, and the Internet.

E. Cingular Meets the Additional Eligibility Criteria Adopted by the FCC in the Recent *ETC Report and Order*

The FCC's *ETC Report and Order* placed additional requirements on carriers seeking ETC designation from the FCC. Specifically an Applicant must: (1) commit to provide service throughout the ETC designated area to all customers making a reasonable request; (2) demonstrate the ability to remain functional in an emergency; (3) demonstrate that it will satisfy the applicable consumer protection and service quality standards; (4) show that it offers local usage plans comparable to the one offered by the incumbent LEC; and, (5) certify that it may be

required to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.⁸

1. *Commitment to provide service throughout the ETC designated area*

a. Providing service upon reasonable request

As required and as AWS specified in its Supplement,⁹ Cingular commits that if a request is made by a potential customer within its existing network coverage, Cingular will provide service immediately using its stand and customer equipment. If a potential customer requests service within Cingular's designated area, but outside its existing network coverage, Cingular will follow the six-step process specified in 47 C.F.R. § 54.202(a)(1)(A). Specifically, Cingular will determine if service can be provided at reasonable cost by (a) modifying or replacing the requesting customer's equipment; (b) deploying a roof-mounted antenna or other equipment; (c) adjusting the nearest cell tower; (d) adjusting network or customer facilities; (e) reselling services from another carrier's facilities to provide service; or (f) employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment.

Cingular also commits to reporting to the FCC, annually, the number of request for service within Cingular's ETC designated service area that were unfulfilled during the past year and providing details regarding how it attempted to provide the customer with service.¹⁰

b. Five year plan

Cingular's five-year plan is attached as Exhibit F and it depicts the increased capital expenditures and corresponding increases in coverage that residents in high-cost areas of

⁸ 47 C.F.R. § 54.202(a).

⁹ AWS Supplement at 8-9.

¹⁰ See 47 C.F.R. § 54.209(a)(3).

Alabama will enjoy if Cingular is granted ETC status. The information contained in this plan is highly confidential and competitively sensitive; therefore, Cingular requests that the Commission grant it confidential treatment in accordance with section 0.459 of the Commission's Rules.

Cingular has to the best of its ability provided estimated completion dates for the improvements; however, the timing for the construction of a cell site or other network improvements depends on numerous variables and thus is subject to change. Also, when relevant, the plan includes estimates of maintenance and upgrade costs as some of the wire centers do not require new construction for each year in the five-year period.

Cingular is also committed to providing, annually, a progress report on its five-year plan at the wire center level.¹¹

2. *Ability to remain functional in an emergency*

Like AWS,¹² Cingular is committed to providing and maintaining essential telecommunications services in times of emergency. Indeed, there are numerous actions Cingular has already taken for emergency preparedness. For example, Cingular has permanent generators at many cell sites¹³, portable generators available for deployment in the region, and generators at all switch locations. Cingular also has monitoring systems in place so that it quickly knows if any switches or cells sites are not functioning properly. In addition, Cingular has built its towers to withstand winds of 200 miles per hour.¹⁴ Although wireless carriers

¹¹ See 47 C.F.R. § 54.209(a)(1).

¹² See AWS Supplement at 7-8.

¹³ Not all cell sites are appropriate for generators.

¹⁴ Cingular's cell sites, however, were not invincible to the "debris-missiles" launched by Katrina's 150 mile per hour winds. Katrina demonstrated that no thickness of steel or level of network redundancy can guarantee that any communications network will survive a worst-case natural or man-made disaster.

remain dependent on the wireline network for voice and data circuits that provide connectivity between the cell site and the switch, from switch to switch, between the wireless network and the landline network, and for IT system connectivity, Cingular will have available back-up microwave equipment to connect sites to the switching center in the event of a long term outage of leased landline facilities.¹⁵ Further, Cingular's cell sites are constructed to allow for quick channel addition in the event of traffic spikes from emergency situations.

As Cingular demonstrated in the aftermath of Hurricane Katrina (as well as Rita and Wilma), it already has extensive emergency response and contingency plans in place in the event of a catastrophic disaster. Following Hurricane Katrina, Cingular's initial response was to set up staging areas to support its employees and to restore service. The company engineered an initial deployment that included 500 portable generators, 800,000 gallons of fuel, 1,000 service personnel, and more than 30 portable cell sites called cell sites on wheels ("COWs") and the first of a new breed of devices, portable cell sites with satellite connectivity mounted on light trucks ("COLTS"), which can be flown or driven into disaster areas. These COLTS work with all Cingular GSM phones enabling victims and first responders to use their existing phones during a crisis. COLTs provide a satellite connection to any of the company's operational switches and require no commercial power or wired network infrastructure.

In accordance with the FCC's rules, Cingular will annually certify that it is able to function in emergency situations.¹⁶ Further, Cingular will fulfill the annual outage reporting requirements.¹⁷

¹⁵ In the aftermath of Hurricane Katrina, Cingular set up microwave technology to decrease its dependence on landline providers, who were also struggling to restore their networks.

¹⁶ See 47 C.F.R. § 54.209(a)(6).

¹⁷ See 47 C.F.R. § 54.209(a)(2).

3. *Applicable consumer protection and service quality requirements*

The Commission has acknowledged that a commitment by a wireless ETC applicant to comply with the CTIA Consumer Code for Wireless Service (“CTIA Code”) will satisfy the requirement to abide by the applicable consumer protection and service quality standards.¹⁸

Cingular, like AWS, has adopted the CTIA Code and is committed to compliance with the CTIA Code throughout its service areas, including those areas where it is seeking designation as an ETC.

Cingular also exceeds the CTIA Code in several respects. For example, Cingular, like AWS, exceeds the 14-day “no-risk” trial period set forth in the CTIA Code by providing a 30-day trial period. In addition, Cingular has instituted other consumer-friendly measures such as Cingular Service Summary (“CSS”) which summarizes for each customer important elements of his or her service, such as calling plan details, first bill and ongoing bill estimator, listing of important standard charges and of Cingular’s policies. Customers that purchase service at a Cingular store receive a customized CSS.

The Commission further requires that ETCs provide the Commission, annually, with the number of consumer complaints per 1,000 handsets.¹⁹ Cingular is committed to fulfilling this requirement and will provide the Commission with aggregated FCC complaint data for the state of Alabama.

¹⁸ See 47 C.F.R. 54.202(a)(3).

¹⁹ See 47 C.F.R. 54.209(a)(4).

4. Local usage comparable to the incumbent LEC

As described in section II.B. above, Cingular is committed to providing calling plans with local usage that is comparable or significantly better than that provided by the local exchange carrier.

5. Provide equal access to long distance carriers if no other ETC is doing so

In accordance with section 54.202(a)(5), Cingular acknowledges that it may be required to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.

III. CINGULAR REQUESTED ETC SERVICE AREA

In light of the merger, the passage of time since the original Petition was filed, and the changes to the ETC eligibility criteria, Cingular hereby amends the requested ETC service area. First, Cingular withdraws all rural telephone company study areas in which designation was requested in the AWS Petition. Second, Cingular withdraws designation requests for fifty-one non-rural BellSouth wire centers and three non-rural CenturyTel wire centers. Third, Cingular requests designation in twenty-six additional non-rural BellSouth wire centers and eighteen additional non-rural CenturyTel wire centers in Alabama. The non-rural wire centers in which Cingular now seeks ETC designation are identified specifically in Exhibit B.

IV. DESIGNATING CINGULAR AS A COMPETITIVE ETC WILL SERVE THE PUBLIC INTEREST

A. Non-Rural Telephone Company Service Areas

As noted above, the Amendment withdraws all rural telephone company study areas from the request for ETC designation in Alabama. The AWS Petition demonstrated why the requested ETC designation would meet the public interest standard applicable in rural areas. In light of

that showing, as well as the information provided below, designation of Cingular in the non-rural areas requested clearly will serve the public interest.

B. Unique Advantages Cingular's Service Offerings

In addition to providing consumers with the benefits of increase choice, there are other advantages to designating Cingular as an ETC. An additional advantage of the merged entity's network is its ability to provide a nationwide GSM network. GSM has the benefit of being the global standard for interconnected mobile voice service and offers a simple migration path for meeting the demand for new services during the conversion to a true 3G network. Additionally, Cingular is currently in the process of transitioning its EDGE data network to the Universal Mobile Telecommunications System ("UMTS") with High Speed Downlink Packet Access ("HSDPA"). Although data is not a supported service, and Cingular will not use universal service funds for data deployment, the availability of mobile data services on Cingular's network is a public interest benefit to subscribers of Cingular's universal service offering.

C. Use of Support for the Preservation and Advancement of Universal Service

Once designated, Cingular commits to use the support it receives for network expenditures for the provision, maintenance, and upgrading of its facilities and services within the designated area. Specifically, as demonstrated herein, Cingular will use the support to build a number of new cell sites and other infrastructure that would not be built but for receipt of universal service funding. Cingular will also use support for other projects for the facilities and services for which the support is intended, to improve the reliability and capacity of wireless service in the supported areas. As described above, Exhibit F provides a five-year plan with estimates as to how the funding will be used in each wire center. Cingular takes seriously the

service responsibility that comes with ETC designation and will use the support it receives to help fulfill this responsibility.

V. HIGH-COST CERTIFICATION

As AWS acknowledged, an ETC applicant must submit its high-cost certification to the FCC since the Alabama Public Service Commission does not regulate wireless carriers. As such, a copy of Cingular's High-Cost Certification is attached as Exhibit C.

VI. ANTI-DRUG ABUSE CERTIFICATION

Cingular's anti-drug abuse certification is included in the Declaration attached as Exhibit A.

VII. CONCLUSION

Cingular respectfully requests that the Commission amend the names of the legal entities for which designation is sought and allow for designation in the wire centers delineated, and the withdrawal of the rural study areas included in the AWS Petition. For the reasons noted above and in the AWS Petition, the Commission should designate Cingular as a federal ETC in each of the wire centers set forth in Exhibit B attached hereto.

Respectfully submitted,

CINGULAR WIRELESS LLC

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By: 

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(202) 419-3055

Its Attorneys

February 23, 2006

Exhibit A

DECLARATION OF CINGULAR WIRELESS LLC

I, Joe Larussa, after first being sworn on oath, and pursuant to 47 C.F.R. § 1.1 state as follows:

1. That I am Vice President/General Manager Gulf States Region. My business address is 3900 N. Causeway Blvd., Suite 1150, Metairie, LA 70002.
2. In my capacity as Vice President/General Manager Gulf States Region, I am an authorized representative of the Company and its subsidiary licensees, New Cingular Wireless PCS LLC ("Cingular") with regarding to Cingular's Amended Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama ("Amended Petition"). I have read Cingular's Amended Petition and believe that the information therein to be true and correct to the best of my knowledge.
3. Cingular is a commercial mobile radio services ("CMRS") licensee authorized by the Federal Communications Commission ("Commission") throughout the licensed service areas wholly or partially within the State of Alabama listed in Exhibit D to the Amended Petition (collectively, "License Service Areas").
4. As discussed in the Amended Petition, Cingular is not subject to state commission jurisdiction in the State of Alabama and, therefore, is seeking designation as an ETC pursuant to the Commission's jurisdiction under 47 U.S.C. §214(e)(6). The Alabama Public Service Commission has affirmatively ruled that it will not exercise jurisdiction over CMRS providers for eligible telecommunications carrier ("ETC") status for the purpose of receiving federal universal service funding.
5. As set forth below, Cingular meets all of the prerequisites to be designated as a federal ETC throughout its requested ETC service areas in the State of Alabama.
6. First, Cingular is a "common carrier" as set forth in the Amended Petition.
7. Second, Cingular currently provides CMRS in the Sate of Alabama and will provide all of the supported service specified in 47 C.F.R § 54.101(a)(1)-(9) in its requested ETC service areas. Cingular currently provides the nine supported services listed below in its Licensed Service Areas, as described in the Amended Petition:
 - (a) Voice Grade Access.
 - (b) Local Usage (see additional information below).
 - (c) Dual Tone Multi-Frequency Signaling or Its Function Equivalent
 - (d) Single-Party Service or its Functional Equivalent.

- (e) Access to Emergency Service.
- (f) Access to Operator Services.
- (g) Access to Interexchange Service.
- (h) Access to Directory Assistance.
- (i) Toll Limitation Services.

8. Third, Cingular will provide the supported services using its own facilities or a combination of its own facilities and the resale of another carrier's service. Cingular will primarily utilize its own network infrastructure, which includes the same antennae, cell-sites, towers, trunking, mobile switching, and interconnection facilities used to serve its existing customers.

9. Fourth, Cingular will advertise the availability of, and charges for, its universal service qualified offerings using media of general distribution.

10. Fifth, Cingular meets the additional eligibility criteria adopted by the FCC in the recent *ETC Report and Order*.¹

a) Cingular commits to provide service throughout the ETC designated area upon reasonable request. If a request is made by a potential customer within its existing network coverage, Cingular will provide service immediately to that customer. If a potential customer requests service within Cingular's designated ETC service area, but outside its existing network coverage, Cingular will follow the six-step process specified in 47 C.F.R. §54.202(a)(1)(A). Cingular's five-year plan for improvements and upgrade for each wire center in which it seeks to be designated as an ETC is attached as Exhibit G.

b) Cingular is committed to providing and maintaining essential telecommunications services in times of emergency. As described in the Amended Petition, provisions for emergency situations include back-up batteries and generators at switches and cell sites, use of mobile cell sites, and redundant transport facilities such as microwave.

c) Cingular will comply with the CTIA Consumer Code for Wireless Service. The Commission has acknowledged that a commitment by a wireless Applicant to comply with the CTIA Code will satisfy an Applicants requirement to abide by the applicable consumer protection and service quality standards.

d) Cingular offers calling plans that provide customers local usage that is comparable to the incumbent LEC. Cingular currently serves over 54.1 million subscribers and

¹ In the Matter of Federal-State Joint Board on Universal Service, Report and Order, ("ETC Report and Order"), CC Docket No. 96-45, (rel. March 17, 2005).

today offers calling plans that range in price from \$39.99 to \$199.99. Calling plans currently offered include free long distance and roaming within the United States and customers are served by the largest voice and data network in America. Most of Cingular's currently offered calling plans include unlimited nights and weekend minutes, while some of the lower priced plans offer generous bundled night and weekend minutes packages. All currently offered calling plan offer unlimited mobile calling between Cingular customers, and currently available plans allow the customer to Rollover unused minutes for use in subsequent months. Further, Cingular's calling plans currently offer all of the following features at no extra charge: Voice Mail, Caller ID, Call Forwarding, Call Waiting, Detailed Billing, and Three-Way Calling. In addition to these calling plans, Cingular also offers an option for prepaid or pay-as-you-go wireless service. All of Cingular's calling plans include the additional feature of mobility that is not available from the incumbent LEC and increases the value of Cingular's calling plans compared to the LEC's.

e) Cingular acknowledges that it may be required to provide equal access to long distance carriers within its designated service area in the event that no other ETC is providing equal access in that area.

11. Sixth, Cingular will utilize the high-cost universal service support it receives only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. As an ETC, Cingular also will offer Lifeline and Link Up telecommunications services to qualified low-income subscribers within its designated ETC service areas, per the Commission's Rules.

12. Seventh, Cingular will comply with all of the required annual reporting requirements associated with being an ETC.

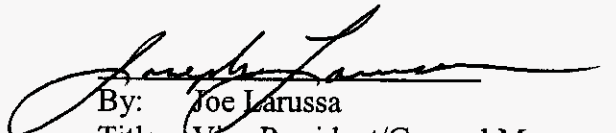
13. Cingular requests designation as a federal ETC in each of the wire centers set forth in Exhibit B attached to this Amended Petition.

14. Finally, designation of Cingular will serve the public interest as described in the Amended Petition.

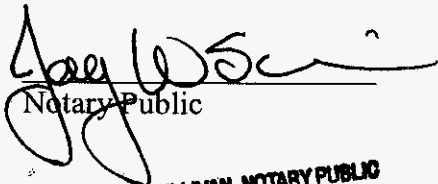
15. ANTI-DRUG ABUSE CERTIFICATION. To the best of my knowledge, no party to the Amended Petition, nor any of their officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) as specified in 1.2002(b) of the Commission's rules, are subject to a denial of federal benefits, including Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse of 1988, 21 U.S.C. § 862.

I hereby certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on February 22nd, 2006.


By: Joe Larussa
Title: Vice President/General Manager

Subscribed and sworn to before me
This 22nd day of February, 2006.


Notary Public



JERRY W. SULLIVAN, NOTARY PUBLIC
ENTIRE STATE OF LOUISIANA
MY COMMISSION IS FOR LIFE
ID# 14677

EXHIBIT B

SAC Code	Study Area
-----------------	-------------------

255181 BellSouth

CLLI	Wire Center
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ALVLALMA	ALBERTVILLE-MAIN
ANTNALLE	ANNISTON-LENLOCK
ATHNALER	ATHENS-ELK RIVER
ATHNALMA	ATHENS-MAIN
ATTLALNM	ATTALLA-MAIN
BLFNALMA	BELLE FONTAINE
BOAZALMA	BOAZ-MAIN
BRTOALMA	BREWTON
BSMRALBU	BESSEMER-BUCKSVILLE
BYMNALMA	BAY MINETTE
CALRALMA	CALERA
CHLSALMA	CHELSEA
CLMBALMA	COLUMBIANA
CLMNALJC	CULLMAN-JONES CHAPEL
CRDVALMA	CORDOVA
CRHLALNM	CARBON HILL
CRLDALMA	COURTLAND
DORAALMA	DORA
EUTWALBO	EUTAW-BOLIGEE
EVRGALMA	EVERGREEN
FTDPALMA	FORT DEPOSIT
FTPYALMA	FORT PAYNE-MAIN
GDSDALHS	GADSDEN-HILLSIDE
GDSDALRD	GADSDEN-RAINBOW DRIVE
GRDLALNM	GARDENDALE
GRLYALMA	GURLEY-MAIN
GTVLALNM	GUNTERSVILLE-MAIN
GYVLALNM	GRAYSVILLE
HNVALRA	HUNTSVILLE-REDSTONE ARSEN.
HNVLALBR	HANCEVILLE-BREMEN
HRTSALNM	HARTSELLE-MAIN
HRTSALPE	HARTSELLE-PENCE
HZGRALMA	HAZEL GREEN-MAIN
JCSNALNM	JACKSON
JCVLALMA	JACKSONVILLE-MAIN
JSPRALMT	JASPER
KLLNALMA	KILLEN
LGTNALMA	LEIGHTON
LVTNALMA	LIVINGSTON
MNTVALNM	MONTEVALLO
MOBLALSA	MOBILE-SARALAND
MOBLALSE	MOBILE-SEMMES
MOBLALTH	MOBILE-THEODORE
MOLTALNM	MOULTON
MTGMALMB	MONTGOMERY-MILLBROOK
MTGMALNO	MONTGOMERY-NORMANDALE
MTVRALMA	MT VERNON
OHTCALMA	OHATCHEE-MAIN
PDMTALMA	PIEDMONT-MAIN

EXHIBIT B

PNSNALMA	PINSON
PRSHALNM	PARRISH
PRVLALMA	PRATTVILLE
RDBAALMA	RED BAY
RLVLALMA	RUSSELLVILLE
RRVLALMA	ROGERSVILLE
SELMALMT	SELMA
STSNALMA	STEVENSON-MAIN
SYLCALMT	SYLACAUGA
THVLALMA	THOMASVILLE
TLDGALMA	TALLADEGA-MAIN
TSCALNO	TUSCALOOSA-NORTHPORT
TSKGALMA	TUSKEGEE
TWCKALMA	TOWN CREEK
UNTWALNM	UNIONTOWN
VNCNALMA	VINCENT
WRRRALNM	WARRIOR
WTMPALMA	WETUMPKA

SAC Code	Study Area
259789	CenturyTel

CLLI	Wire Center
BLBTALXA	BAYOU LA BATRE
BRILALXA	BRILLIANT
BRNDALXA	BRUNDIDGE
BRRYALXA	BERRY
CHLFALXA	CHULAFINNEE
CRTNALXA	CARROLLTON
DBSPALXA	DOUBLE SPRINGS
DELTALXA	DELTA
ETVLALXA	ETHELSTVILLE
FWRVALXA	FOWL RIVER
GDBAALXA	GRAND BAY
GORDALXA	GORDO
GRGNALXA	GEORGIANA
HCBGALXA	HACKLEBURG
HFLNALXA	HEFLIN
HLVLALXA	HALEYVILLE
HMTNALXA	HAMILTON
IRSEALXA	IRVINGTON
LECTALXA	LECTA
LNCLALXA	LINCOLN
MLCYALXA	MIDLAND CITY
MRCRALXA	MORRISONS XRDC12
PHBLALXA	PHIL CAMPBELL
PLCYALXA	PELL CITY
SCBOALXA	SCOTTSBORO
THRSALXA	THORSBY
VERNALXA	VERNON
VYHDALXA	VALLEY HEAD
WCBGALXA	WICKSBURG
WEDWALXA	WEDOWEE

EXHIBIT C

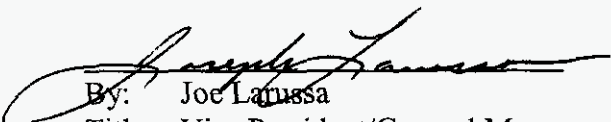
HIGH-COST CERTIFICATION

I, Joe Larussa, in my capacity as Vice President/General Manager Gulf States Region of Cingular Wireless LLC, and on behalf of its subsidiary licenses New Cingular Wireless PCS, LLC, Blue Licenses Holding, LLC, Orange Licenses Holding, LLC (collectively, "Cingular"), being of lawful age and duly sworn, state, declare and certify under penalty of perjury as follows:

1. Cingular will use the universal service support it receives only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
2. I am authorized by Cingular to make this statement.

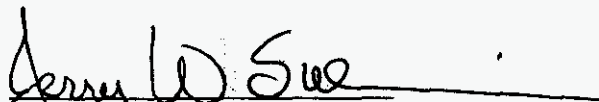
I hereby certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on February 22nd, 2006.


By: Joe Larussa
Title: Vice President/General Manager –
Gulf States Region

(Notary Seal)

Subscribed and sworn to before me
This 22nd day of February, 2006.


Notary Public



JERRY W. SULLIVAN, NOTARY PUBLIC
ENTIRE STATE OF LOUISIANA
MY COMMISSION IS FOR LIFE
ID# 14677

EXHIBIT D
Cingular Cellular and PCS Licenses in Alabama -- 2/8/06
(at least one market county located in Alabama)

Licensee	Own%	Call Sign	Service	Market#	Block	Market Name
BLUE LICENSES HOLDING, LLC	100	KNLF457	PCS	BTA305	C	Montgomery, AL
BLUE LICENSES HOLDING, LLC	100	KNLF604	PCS	BTA017	C	Anniston, AL
BLUE LICENSES HOLDING, LLC	100	KNLF605	PCS	BTA044	C	Birmingham, AL
BLUE LICENSES HOLDING, LLC	100	KNLF606	PCS	BTA108	C	Decatur, AL
BLUE LICENSES HOLDING, LLC	100	KNLF607	PCS	BTA158	C	Gadsden, AL
BLUE LICENSES HOLDING, LLC	100	KNLF608	PCS	BTA198	C	Huntsville, AL
BLUE LICENSES HOLDING, LLC	100	KNLF609	PCS	BTA450	C	Tuscaloosa, AL
BLUE LICENSES HOLDING, LLC	100	KNLF949	PCS	BTA044	F	Birmingham, AL
BLUE LICENSES HOLDING, LLC	100	KNLG350	PCS	BTA450	D	Tuscaloosa, AL
BLUE LICENSES HOLDING, LLC	100	KNLG914	PCS	BTA146	F	Florence, AL
BLUE LICENSES HOLDING, LLC	100	KNLG927	PCS	BTA302	F	Mobile, AL
BLUE LICENSES HOLDING, LLC	100	KNLG933	PCS	BTA415	F	Selma, AL
BLUE LICENSES HOLDING, LLC	100	WPOI257	PCS	MTA028	B	Memphis-Jackson
BLUE LICENSES HOLDING, LLC	100	WPOI259	PCS	MTA011	A	Atlanta
BLUE LICENSES HOLDING, LLC	100	WPOK626	PCS	BTA146	C	Florence, AL
BLUE LICENSES HOLDING, LLC	100	WPOK646	PCS	BTA292	C	Meridian, MS
BLUE LICENSES HOLDING, LLC	100	WPOK647	PCS	BTA305	C	Montgomery, AL
BLUE LICENSES HOLDING, LLC	100	WPOK652	PCS	BTA334	C	Opelika-Auburn, AL
DECATUR RSA LIMITED PARTNERSHIP	80	KNKN903	Cellular	CMA307	B	Alabama 1 - Franklin
New Cingular Wireless PCS, LLC	100	KNLF221	PCS	MTA011	A	Atlanta
New Cingular Wireless PCS, LLC	100	KNLG389	PCS	BTA044	E	Birmingham, AL
New Cingular Wireless PCS, LLC	100	KNLG410	PCS	BTA108	E	Decatur, AL
New Cingular Wireless PCS, LLC	100	KNLG429	PCS	BTA146	E	Florence, AL
New Cingular Wireless PCS, LLC	100	KNLG447	PCS	BTA198	E	Huntsville, AL
New Cingular Wireless PCS, LLC	100	KNLG489	PCS	BTA302	E	Mobile, AL
New Cingular Wireless PCS, LLC	100	KNLG566	PCS	BTA450	E	Tuscaloosa, AL
New Cingular Wireless PCS, LLC	100	WPXS751	PCS	BTA158	E	Gadsden, AL
Orange Licenses Holding, LLC	100	KNKA262	Cellular	CMA041	B	Birmingham, AL
Orange Licenses Holding, LLC	100	KNKA392	Cellular	CMA120	B	Huntsville, AL
Orange Licenses Holding, LLC	100	KNKA461	Cellular	CMA083	A	Mobile, AL
Orange Licenses Holding, LLC	100	KNKA575	Cellular	CMA249	B	Anniston, AL
Orange Licenses Holding, LLC	100	KNKA609	Cellular	CMA222	B	Tuscaloosa, AL
Orange Licenses Holding, LLC	100	KNKA621	Cellular	CMA226	B	Florence, AL
Orange Licenses Holding, LLC	100	KNKA660	Cellular	CMA272	B	Gadsden, AL
Orange Licenses Holding, LLC	100	KNKN679	Cellular	CMA312	A	Alabama 6 - Washington

EXHIBIT D
Cingular Cellular and PCS Licenses in Alabama -- 2/8/06
(at least one market county located in Alabama)

Licensee	Own%	Call Sign	Service	Market#	Block	Market Name
Orange Licenses Holding, LLC	100	KNKN685	Cellular	CMA311	B	Alabama 5 - Cleburne
Orange Licenses Holding, LLC	100	KNKN761	Cellular	CMA309	B	Alabama 3 - Lamar
Orange Licenses Holding, LLC	100	KNKN959	Cellular	CMA308	B	Alabama 2 - Jackson
Orange Licenses Holding, LLC	100	KNKQ276	Cellular	CMA307	B	Alabama 1 - Franklin
Orange Licenses Holding, LLC	100	KNKQ369	Cellular	CMA307	B	Alabama 1 - Franklin
Orange Licenses Holding, LLC	100	KNLG614	PCS	BTA115	E	Dothan-Enterprise, AL
Orange Licenses Holding, LLC	100	KNLG620	PCS	BTA158	E	Gadsden, AL
Orange Licenses Holding, LLC	100	KNLG631	PCS	BTA305	E	Montgomery, AL
Orange Licenses Holding, LLC	100	KNLG635	PCS	BTA334	E	Opelika-Auburn, AL
Orange Licenses Holding, LLC	100	KNLG640	PCS	BTA415	E	Selma, AL
Orange Licenses Holding, LLC	100	KNLG928	PCS	BTA305	F	Montgomery, AL
Orange Licenses Holding, LLC	100	KNLH501	PCS	BTA092	E	Columbus, GA
Orange Licenses Holding, LLC	100	WPOJ839	PCS	BTA092	C	Columbus, GA
Orange Licenses Holding, LLC	100	WPOK616	PCS	BTA094	C	Columbus-Starkville, MS
Orange Licenses Holding, LLC	100	WPXT206	PCS	MTA011	A	Atlanta